

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION LITIGATION**

MDL No. 2492

Master Docket No. 1:13-cv-09116

**Judge John Z. Lee**

**Magistrate Judge M. David Weisman**

## DECLARATION OF JOHANNA SPELLMAN

I, Johanna Spellman, declare as follows:

1. I am an attorney with Latham & Watkins LLP, counsel of record for the National Collegiate Athletic Association (“NCAA”). On July 30, 2014, I was appointed by the Court as Liaison Counsel for the NCAA. I make this declaration based upon my personal knowledge, and I am competent to testify as to its contents.

2. On May 9, 2017, the Court ordered the filing of a motion for a rule to show cause as to any NCAA member institution that had not complied with subpoenas requesting last-known student-athlete contact information. At a May 23, 2017 hearing, the Court ordered that the foregoing motion for a rule to show cause be filed by June 6, 2017.

3. On June 6, 2017, Settlement Class Representatives moved this Court for entry of an order directing seven (7) NCAA member institutions that had not yet complied with subpoenas for last-known contact information for student-athletes to show cause why they should not be held in contempt (the “Motion”).<sup>1</sup>

<sup>1</sup> Capitalized terms in this submission have the meaning ascribed to them in the Second Amended Class Action Settlement Agreement and Release, which is Exhibit 1 to the Joint Motion for Preliminary Approval of Second Amended Class Settlement and Certification of Settlement Class and Settlement Subclasses. See Second Am. Settlement Agt. (Dkt. #266-1).

4. Since the June 20, 2017 hearing on the Motion, the remaining two (2) NCAA member institutions -- Southern University, Baton Rouge; and the University of Puerto Rico, Rio Piedras -- have complied with the subpoenas.

EXECUTED on this 6th day of July, 2017, at Chicago, Illinois.

/s/ Johanna M. Spellman

Johanna M. Spellman

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